1 The Honorable Kymberly K. Evanson 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 FANTASIA TRADING, LLC D/B/A NO. 2:23-cv-01436-KKE 10 ANKERDIRECT, **DECLARATION OF EDWIN** 11 WHEELER IN SUPPORT OF Plaintiff, 12 MOTION FOR EXTENSION OF INITIAL SCHEDULING DATES 13 v. 14 SLICE ENGINEERING LLC, 15 Defendant. 16 I, Edwin Wheeler, hereby declare and certify as follows: 17 1. I am over the age of 18 years and am competent to testify. I make this 18 declaration based upon personal knowledge unless otherwise stated herein. 19 2. I am a partner with the firm Cross-Border Counselor LLP, attorneys for Fantasia 20 Trading, LLC d/b/a AnkerDirect ("AnkerDirect" or "Plaintiff"). 21 3. Defendant Slice Engineering, LLC ("Defendant") is represented by Philipp 22 Ruben and Chris Carani of McAndrews, Held & Malloy, Ltd. 23 4. Plaintiff requested that Defendant agree to waive service of the summons and 24 complaint for this case pursuant to Federal Rules of Civil Procedure Rule 4, and Defendant has 25 agreed to do so. 26 27 SAVITT BRUCE & WILLEY LLP DECLARATION OF EDWIN WHEELER IN SUPPORT OF 1425 Fourth Avenue Suite 800 MOTION FOR EXTENSION OF INITIAL SCHEDULING Seattle, Washington 98101-2272

(206) 749-0500

DATES-1

No. 2:23-cv-01436-KKE

- 5. I have been engaged in discussions with Defendant's counsel regarding a potential resolution of this action.
- 6. Although no counsel for Defendant has appeared yet, Defendant's counsel agreed that we should ask the Court to extend the initial scheduling dates set forth in the Court's October 19, 2023 Order (Dkt. 12) by 30-days so that we can continue those discussions in an attempt to resolve the dispute that is the subject of this case.
- 7. Defendant's counsel approved the language that my co-counsel, Brandi Balanda, sent to the Court making this request on December 7, 2023.
- 8. I believe it would save the parties and the court resources if the initial scheduling dates were extended by 30-days to allow the parties to continue their settlement discussions.

I declare and certify under penalty of perjury that the foregoing is true and correct. Executed on this 8th day of December, 2023 at Portola Valley, California.

By: /s/ Edwin Wheeler
Edwin Wheeler

1 2

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 8, 2023 I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 8<sup>th</sup> day of December, 2023 at Seattle, Washington.

Meghan Parker